

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- x
: :
IN RE ALUMINUM WAREHOUSING : MDL No. 2481
ANTITRUST LITIGATION : Master Docket No.
: 13-md-2481-KBF-RLE
This Document Relates To: :
: :
ALL ACTIONS :
: :
: :
----- x

**DEFENDANTS' NOTICE OF THEIR JOINT MOTION TO DISMISS
ALL FEDERAL AND STATE ANTITRUST CLAIMS
FOR LACK OF ANTITRUST STANDING**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Joint Motion to Dismiss All Federal and State Antitrust Claims for Lack of Antitrust Standing, the undersigned hereby move this Court in the above-captioned action before the Honorable Katherine B. Forrest, United States District Judge for the Southern District of New York – Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15A, New York, New York, 10007, for an order dismissing all federal and state antitrust claims pursuant to Fed. R. Civ. P. 12(b)(6).

Dated: April 22, 2014

Respectfully submitted,

/s/ Richard Pepperman, II (on consent)¹
Richard C. Pepperman, II
(*peppermanr@sullcrom.com*)
Suhana S. Han (*hans@sullcrom.com*)
Joseph J. Matelis (*matelisj@sullcrom.com*)
Yavar Bathaee (*bathaeey@sullcrom.com*)
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

Attorneys for Defendants GS Power Holdings, LLC, The Goldman Sachs Group, Inc. and Metro International Trade Services, L.L.C.

/s/ Robert D. Wick (on consent)
Robert D. Wick (*rwick@cov.com*)
Neil K. Roman (*nroman@cov.com*)
Henry Liu (*hliu@cov.com*)
COVINGTON & BURLING LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: (202) 662-5758
Facsimile: (202) 778-5758

Attorneys for Defendants Henry Bath, LLC and JP Morgan Chase & Co

/s/ Margaret M. Zwisler
Margaret M. Zwisler (admitted *pro hac vice*)
(*margaret.zwisler@lw.com*)
William R. Sherman
(*william.sherman@lw.com*)
Jennifer L. Giordano
(*jennifer.giordano@lw.com*)
Jeffrey H. Newhouse
(*jeffrey.newhouse@lw.com*)
LATHAM & WATKINS LLP
555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004
Telephone: (202) 637-2200
Facsimile: (202) 637-2201

Attorneys for Defendant The London Metal Exchange and LME Holdings, Ltd.

/s/ John M. Nannes (on consent)
John M. Nannes
(*john.nannes@skadden.com*)
John H. Lyons (admitted *pro hac vice*)
(*john.h.lyons@skadden.com*)
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005
Telephone: (202) 371-7500
Facsimile: (202) 661-9191

Attorneys for Defendant Pacorini Metals USA, LLC

¹ Defendants besides the LME and LME Holdings use electronic signatures with consent in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

/s/ Eliot Lauer (on consent)

Eliot Lauer (*elauer@curtis.com*)

Jacques Semmelman (*jsemelman@curtis.com*)

Chelsea McLean (*chelsea.mclean@curtis.com*)

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP

101 Park Avenue

New York, NY 10178-0061

Telephone: (212) 696-6000

Facsimile: (212) 697-1559

Attorneys for Defendant Glencore Ltd.